

1 JASON M. FRIERSON
2 United States Attorney
Nevada Bar Number 7709
3 JARED L. GRIMMER
Assistant United States Attorney
501 Las Vegas Boulevard South, Suite 1100
4 Las Vegas, Nevada 89101
Tel: (702) 388-6336/Fax: (702) 388-6418
5 jared.l.grimmer@usdoj.gov
Attorneys for the United States

6

7 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

8 UNITED STATES OF AMERICA,

Case No. 2:22-mj-00654-BNW

9 Plaintiff,

10 v.

11 GERMAN ALONSO DEL REAL-AGUIRRE,
aka "German Alonso Del Real Aguirre,"
12 aka "German Alonso Del Real,"

**Stipulation for an Order
Directing Probation to Prepare
a Criminal History Report**

13 Defendant.

14

15 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M.
16 Frierson, United States Attorney, and Jared L. Grimmer, Assistant United States Attorney,
17 counsel for the United States of America, Rene L. Valladares, Federal Public Defender, and
18 Emma Smith, Assistant Federal Public Defender, counsel for Defendant GERMAN
19 ALONSO DEL REAL-AGUIRRE, that the Court direct the U.S. Probation Office to
20 prepare a report detailing the defendant's criminal history.

21 This stipulation is entered into for the following reasons:

22 1. The United States Attorney's Office has developed an early disposition
23 program for immigration cases, authorized by the Attorney General pursuant to the

24

1 PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has
2 extended to the defendant a plea offer in which the parties would agree to jointly request an
3 expedited sentencing immediately after the defendant enters a guilty plea.

4 2. The U.S. Probation Office cannot begin obtaining the defendant's criminal
5 history until after the defendant enters his guilty plea unless the Court enters an order
6 directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of
7 a defendant's initial appearance when charged by indictment.

8 3. The U.S. Probation Office informs the government that it would like to begin
9 obtaining the criminal history of defendants eligible for the early disposition program as
10 soon as possible after their initial appearance so that the Probation Office can complete the
11 Presentence Investigation Report by the time of the expected expedited sentencing.

12 4. Accordingly, the parties request that the Court enter an order directing the
13 U.S. Probation Office to prepare a report detailing the defendant's criminal history.

14 DATED this 22nd day of August, 2022.

Respectfully Submitted,

RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

/s/ Emma Smith
EMMA SMITH
Assistant Federal Public Defender
Counsel for Defendant GERMAN
ALONSO DEL REAL-AGUIRRE

/s/ Jared L. Grimmer
JARED L. GRIMMER
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Case No. 2:22-mj-00654-BNW

Plaintiff,

Order Directing Probation to Prepare a Criminal History Report

V.

GERMAN ALONSO DEL REAL-AGUIRRE,
aka "German Alonso Del Real Aguirre,"
aka "German Alonso Del Real,"

Defendant.

Based on the stipulation of counsel, good cause appearing, and the best interest of justice being served:

IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a report detailing the defendant's criminal history.

DATED this 23rd day of August, 2022.

Berlweker

HONORABLE BRENDA N. WEKSLER
UNITED STATES MAGISTRATE JUDGE